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11 *Attorneys for Defendant, Hartford Fire Insurance Company*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 SALVADOR PLASCENCIA, individually; and
15 KYLE HAIL, individually,

16 Plaintiffs,

17 vs.

18 HARTFORD FIRE INSURANCE COMPANY,
19 a Connecticut Corporation; DOES, I through X,
20 inclusive; ROE BUSINESS ENTITIES, I
21 through X, inclusive,

22 Defendants.

Case No.: 2:22-cv-01420-GMN-VCF

23 **UNOPPOSED MOTION TO EXTEND**
24 **TIME TO RESPOND TO PLAINTIFFS'**
25 **COMPLAINT**

26 **(First Request)**

27 Defendant Hartford Fire Insurance Company ("Hartford"), by and through their
28 undersigned counsel of record, Darren T. Brenner, Esq., and Lindsay D. Dragon, Esq., hereby
submits the following Unopposed Motion to Extend Time to Respond to Plaintiff's Complaint.

On July 22, 2022, Plaintiffs Salvador Plascencia and Kyle Hail ("Plaintiffs") filed their
Complaint with the Eighth Judicial District Court for the State of Nevada as Case No. A-22-
855833-C [ECF No. 1-1]. Hartford removed the action to the United States District Court on
August 31, 2022 [ECF No. 1]. Pursuant to Fed. R. Civ. P. 81(c)(2)(C), Hartford has 7 days from
the removal to file its response to the Complaint, which makes the current deadline September 7,
2022. Hartford's counsel is still investigating the allegations raised in Plaintiff's Complaint.
Further, Hartford's counsel will be out of the office for the upcoming Labor Day weekend.

1 In light of the circumstances, Hartford's counsel conferred with Plaintiffs' counsel
2 regarding the proposed extension, and counsel for Plaintiffs agreed to extend the deadline for
3 Hartford to respond to the Complaint to September 22, 2022.

4 Accordingly, Hartford hereby moves to extend the deadline to respond to Plaintiffs'
5 Complaint to September 22, 2022. This is the first request for an extension of time, which is
6 requested in good faith and is not for purposes of delay or prejudice to any other party.

7 DATED this 1st day of September, 2022.

8 WRIGHT, FINLAY & ZAK, LLP

9 /s/ Lindsay D. Dragon

10 Darren T. Brenner, Esq.

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12 Lindsay D. Dragon, Esq.

13 Nevada Bar No. 13474

14 7785 W. Sahara Ave., Suite 200

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16 *Attorneys for Defendant, Hartford Fire Insurance*
17 *Company*

18 **IT IS SO ORDERED.**

19 DATED: 9-19-2022

20 

21 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b) and Electronic Filing Procedure IV(B), I certify that on the 1st day of September, 2022, a true and correct copy of the foregoing **UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFFS' COMPLAINT** was transmitted electronically through the Court's e-filing electronic system to the attorney(s) associated with this case.

/s/ Jason Craig

An Employee of WRIGHT, FINLAY & ZAK, LLP